

Versatility in Form and Function

IN THIS ISSUE . . .

Premier Partner Product Updates & Educational Opportunities – Get the latest on important product changes from Securities America's premier partners. Plus, see what webcasts and educational opportunities are coming up.

Supervision Hot Topic: Principal Protection Riders – A primer of the care and diligence needed when working with variable annuities.

Premier Partner Focus – Quality, Choice, and Freedom. Be sure to read how these three words set Jackson National Life apart.

Premier Partner Highlights – Take a moment to learn more about our premier partners.

Premier Partner Interview – Read why one of our representatives chooses to work with Pacific Life.

Supplements – At the end of this newsletter you'll find the Advanced Sales Corporation's "Annuity Intelligence Report" for this issue's highlighted partners. These reports are filled with valuable information on these firms and can help you assess their product offerings. *These reports are by third parties and may not include all contract features, provisions, charges, etc. These reports must be used in conjunction with the applicable prospectus for the annuity included in the reports. The prospectus will include all rules, fees and charges for the variable annuity.*

PREMIER PARTNER PRODUCT AND OFFERING UPDATES

Allianz

Effective Mar. 8, the Quarterly Value Death Benefit on the **Vision NY** contract is no longer available.

AXA

Effective Mar. 1, a new VA contract, **Retirement Cornerstone**, was made available as a B, C, L and Bonus Share contract.

Effective Mar. 1, the current and maximum fee charged on all Death and GMWB benefits of the **Accumulator 9.0** series is increasing by 0.1% and the minimum waiting period for dollar for dollar withdrawals was dropped to one year from five years.

Hartford

Effective Mar. 15, the current fee charged on the Return of Premium Death Benefit was decreased to 0.25% (previously 0.30%).

ING

Effective Mar. 15, the **Empire Innovations**, **Empire Traditions**, **GoldenSelect Access**, **GoldenSelect ES II**, and **GoldenSelect Landmark** contracts are no longer available

for purchase.

Effective Mar. 15, 2010, a new VA contract, **Select Opportunities**, was made available as a 5-year CDSC, B-Share contract.

Effective Mar. 29, 2010, the **Encore** contract is no longer available for purchase.

Lincoln Financial

Effective Feb. 8, the sales charges were adjusted on A-Share contracts, **American Legacy Shareholder's Advantage** and **ChoicePlus Assurance A-Share**.

Effective Mar. 5, bonus credits applied to a **ChoicePlus Assurance Bonus** contract within 1 year of the date of death of the owner may be recaptured.

Integrity

Effective Mar. 1, the lifetime GMWB rider withdrawal percentages decreased by 0.5% and the benefit base step-ups decreased by 0.5% across all age bands on the **AnnuiChoice II**, **AdvantEdge**, and **Pinnacle V** contracts.

OFFERING UPDATES & EDUCATIONAL EVENTS

Please be sure to contact your local wholesaler to confirm product update information before discussing them with your clients.

Prudential

Effective Mar. 15, five new VA Contracts, **Premier Retirement B, C, L, X (Bonus)**, and **Advisor Series**, were made available. Please check with Prudential in regards to any state specific variations.

Effective Mar. 15, the **Premier B, L, and X**, also the **ASAP III, Advisors Select 2000, Apex II, ASL II, and XTRA Credit Six** are

no longer available for purchase.

Sun Life

Effective Feb. 8, the Income ON Demand III Escalator Lifetime GMWB is no longer available on **all Sun Life contracts**.

Effective Feb. 8, the Sun Income Riser Lifetime GMWB step-up increased from 6% to 7% on **all Sun Life contracts**.

PREMIER PARTNER WEBCASTS & EDUCATIONAL EVENTS

Following are webcasts that a few of our premier partners will be hosting over the upcoming quarter. For details on attending any of these webcasts, please contact the premier partner directly at the number listed.

Integrity (800-900-6460)

May 13 – Income Strategies for the New Decade

Jackson National (800-711-5653)

April 22 – Top 50 IRA Rules

May 20 – The Client Centered Advisor

June 17 – Transfers, Taxes, and Turmoil: The Importance of Annuity Titling

John Hancock (800-897-4057)

April 22 – First Quarter Investment Webinar

RiverSource (800-549-8230)

May 4 – Portfolio Navigator Teleconference featuring MorningStar

Nationwide (800-321-6064)

March 18 – Ron Carson – Three Secrets to Success

April 7 – Nationwide Quarterly Compliance Update

June 17 – Becoming Productive & Profitable through Systematization

SUPERVISION HOT TOPIC: PRINCIPAL PROTECTION RIDERS

Principal protection comes in a variety of forms in current variable annuity offerings. As such, it is increasingly important for a representative to make sure that a client understands the type of principal protection being received and when it applies via the benefit rider selected.

At present, there are three basic forms of living benefit riders that provide principal protection for an additional fee. These riders include the Guaranteed Minimum Income Benefit (“GMIB”), Guaranteed Minimum Withdrawal Benefit (“GMWB”) and Guaranteed Return of Principal option (“GRP”). The GMIB and GMWB provide a level of principal protection by guaranteeing the client the ability to make withdrawals or receive income payments in amounts designed to return, at a minimum, the principal amount(s) invested in the contract. The GRP option differs in that it is a straight forward guarantee of the return of the principal amount(s) invested, plus any applicable step up value, provided that the contract is held for a specified period of time, normally between five (5) and ten (10) years.


The tricky part for a representative is that sometimes a client may focus on or remember one particular phrase or key word in a discussion and not retain the other information provided. More specifically, “I am guaranteed to get my money back if I invest in this contract.” However, as we all know, there are going to be some limitations to the guarantee such as a

RIDERS NEED CAREFUL CONSIDERATION

It is very important that you are absolutely clear with clients regarding the terms and conditions surrounding any variable annuity riders.

required holding period or a maximum annual withdrawal amount. Additionally, if a client intends to liquidate their contract, the benefit riders may not apply and the liquidation amount may be less than the original amount invested.

So, what is a representative to do? Make sure you have a specific, documented conversation with your clients regarding the rider selected, how it works, when it applies and any limitations to the principal guarantee offered. Utilize the comments section of the Variable Annuity Purchase Acknowledgment Form to further disclose the rider selected, the benefit to the client and any limitations. Upon delivery of the contract and subsequent client update meetings, reinforce the terms and provisions of the contract. Finally, make sure the client knows the difference between the benefit base and contract surrender value as they may appear on the client statement issued by the product sponsor.

Today's variable annuity contracts offer an array of valuable and innovative benefits to meet the needs of the investing public. However, each comes with its own unique set of requirements and may also have variations that change from one product sponsor to another. Because of this, it underscores the importance that a representative has a thorough understanding of the product and riders recommended in order to clearly communicate and manage the expectations of a client, in addition to matching a the benefit to the identified needs of the client. 

PREMIER PARTNER FOCUS: JACKSON NATIONAL LIFE


Quality, Choice, and Freedom

Describing yourself in three words in no easy task. Describing a company with the largest variable annuity contract sold through financial advisors seems an even greater challenge. But at Jackson® we embrace our core values every single day, striving to deliver *Quality, Choice* and *Freedom* to our valued partners are their clients.

Jackson's *Quality* is marked by our disciplined approach to business, including conservative product pricing, a prudent approach to risk management, and financial strength ratings that have not changed for the last seven years. *Quality* doesn't stop with the company. Jackson also has one of the best wholesaling forces in the industry: "The wholesaling team is fantastic. Jessica Willis and Kristin Billows are very professional and efficient. I love the way I can call in with new clients' SSN and they will track the transfer and call me as soon as the money hits. I also like being a part of the Jackson Stars Program," said Dan O'Leary, a Securities America representative who works with Jackson in Denver.

Jackson's focus on quality hasn't prevented us from giving representatives and their clients *Choice*. In addition to offering a wide variety of investment options, many that are available only at Jackson, we also provide a diverse suite of optional benefit guarantees to help address the unique challenges clients may face in retirement: "I love the extensive investment choices and the flexibility to choose from any of the available choices, including alternatives," O'Leary stated.

Every client's needs are unique, which is why Jackson offers a multitude of choices, but having the *Freedom* to deliver customized retirement solutions is what sets Jackson apart. Jackson enables representatives to craft the ideal contract for every client by taking advantage of no asset allocation requirements and the option to add many of our optional benefits without limiting their ability to invest: "I also like the fact that I am not forced to use an investment model in order to use the living benefit rider," added Dan O'Leary.

Quality, Choice, Freedom. At Jackson, they are a way of life, a way of doing business, and the reason for our success. *That's* the Jackson difference. 

A WIDE RANGE OF INVESTMENT OPTIONS

Pacific Life annuity products offer a wide range of investment options with access to names like American Funds, Pimco, GE Asset Management and Black Rock through a total of approximately 44 different subaccounts.


Pacific Life's variable annuity products offer a wide range of investment options to diversify client's assets. Pacific Life's variable annuity clients have access to professional money managers like AllianceBernstein, American Funds, BlackRock, Franklin Templeton, GE Asset Management, and PIMCO among others. With 44 variable investment options to choose from, net expenses range from .28% to 1.56% annually.

Pacific Life has recently changed their optional living benefit rider line-up that is available with their variable annuities and currently offer the following options:

- CoreIncome Advantage (GMWB)
- CoreProtect Advantage (GMWB)
- Income Access (GMWB)
- Guaranteed Income Advantage Plus (GMIB)
- Guaranteed Protection Advantage 3 (GMAB)
- Stepped-Up and Earnings Enhanced Death Benefit

Pacific Life's Guaranteed Minimum Withdrawal Benefit (GMWB) riders offer several different withdrawal options for clients with differing income goals. The Income Access rider allows the client to take withdrawals of 7% and allows for annual step-ups. The 7% withdrawal is guaranteed until the purchase payments are returned. Step-ups on this rider can take place manually or automatically so advisors should make sure to elect the desired option at issue. The CoreProtect Advantage and CoreIncome Advantage riders are designed to provide clients with a guaranteed income for life as long as the oldest owner is age 65 or older when the first withdrawal is made. If the oldest owner is not 65 when the first withdrawal, or the first withdrawal after a step-up, is made the GMWB benefit will not have the lifetime option and will revert to a guaranteed return of the purchase payments.

CoreProtect Advantage is available at a cost of 1.05% and is calculated on the benefit base. The guaranteed income benefit base is the highest anniversary value or the purchase payments increased by 5% annually. The guaranteed 5% increases apply for the first ten years or up to the first withdrawal. Once withdrawals are made this rider provides guaranteed withdrawals of 5% and annual automatic step-ups to lock in market gains. CoreIncome Advantage is available at a cost of .40% assessed on the benefit base and allows for a guaranteed withdrawal of 4% and annual automatic step-ups to lock in market gains.

Pacific Life's Stepped-Up and Earning Enhancement Guarantee death benefit riders can be added to contracts at issue through age 75. The Stepped-Up death benefit will automatically lock in the client's highest anniversary value as a death benefit up to the anniversary prior to the oldest annuitant's 81st birthday. The Earning Enhancement Guarantee will provide a benefit of 40% of the contract earnings at death and is capped at 40% of the adjusted purchase payments. This benefit is reduced to 25% for issue ages 70-75. 

Variable annuities are sold by prospectus. Before investing, investors should carefully consider the investment objectives, risks, charges and expenses of the variable annuity and its underlying investment options. This and other important information is contained in the current contract prospectus and underlying fund prospectuses. Please read the prospectus carefully prior to investing. This information is designed to provide a general overview of the company's products and is not intended to cover all of the product features. Guarantees, claims, and contract terms stated in the presentation may no longer be current. Please see product sponsor sales literature for current information on contract terms and guarantees. It's important to consider your clients' financial needs and situation and risk tolerance when recommending a variable annuity and its optional benefits.

PREMIER PARTNER INTERVIEW: PACIFIC LIFE

Why Rick Tonkinson, CFP®, Uses Pacific Life Variable Annuities in His Practice

Since joining Securities America five years ago, Rick Tonkinson, CFP, has placed nearly \$100 million in variable annuity sales with Pacific Life. He values the wide range of product offerings to the extent that he personally owns two Pacific Life variable annuities! Rick is a member of Pacific Life's Pacific Advisory Group, which includes some of the top financial professionals in the industry. At the recent Securities America's Masters Forum conference in Paradise Island, The Bahamas, Rick shared why he likes doing business with Pacific Life.

What do you like most about working with Pacific Life?

"The Pacific Life Experience is awesome. I have a uniform experience with everyone from customer service to my field and internal wholesalers. They are knowledgeable and accountable. I enjoy their prompt responses and attention to detail. Pacific Life's customer service is the best in the industry. I have had many experiences at other companies where the call center will say one thing, and the wholesaler says something else. My loyalty has a direct correlation to the level of service I get at Pacific Life."

We understand you have many companies to choose from, so why do you decide to use Pacific Life?


"I like the product mix that Pacific Life offers. Pacific Life still offers the C-share, L-share, B-share, and bonus variable annuity products, which is not always the case with other carriers. This gives me the opportunity to select the right products for the different types of clients I have. My favorite, however, is the Pacific Innovations *Select*™ variable annuity because its three-year surrender charge period provides the flexibility my clients require should their needs change."

"Another big factor in choosing Pacific Life is its mutual holding structure. Pacific Life communicates clearly about the company's direction and its continuing focus on long-term financial goals and strength."

"Ease-of-use is also critical for me and my clients. Pacific Life's products are excellent and simple enough for my middle-class clients to understand. The final and probably most important consideration was—and still is—the people. The individuals that I deal with at Pacific Life is reliable, loyal, smart, and honest. They are good employees, but better human beings. This goes a long way when I am selling guarantees that will protect my clients' retirement. I cannot work with people or companies I don't trust."

What has been your most successful business growth venture with Pacific Life?

"My most successful business venture with Pacific Life has been the relationship itself. From my very first interaction with National Accounts to my current relationship with my consultative wholesaler Brian Stone, we have worked together very successfully. From my trust in the company to the excellent trail-based commissions, my relationship with Pacific Life has been great. My business has grown through hard work to levels I never imagined, but one of the best relationships I have ever built, that has been the most rewarding as well, is the one I have with Pacific Life."

For more information about Pacific Life and its products and services, contact your Pacific Life consultative wholesaler at **(800) 722-2333**. 

Investors should carefully consider a variable annuity's risks, charges, limitations, and expenses, as well as the risks, charges, expenses, and investment objectives of the underlying investment options. This and other information about Pacific Life are provided in the product and underlying fund prospectuses. These prospectuses should be read carefully by clients before investing.

This material is not intended to be used, nor can it be used by any taxpayer, for the purpose of avoiding U.S. federal, state, or local tax penalties.

PACIFIC LIFE VALUE

From companywide consistency to versatility of product offerings, Pacific Life has been a frequent choice for Securities America representative Rick Tonkinson, CFP.

PREMIER PARTNER INTERVIEW: PACIFIC LIFE *(continued)*

This material is written to support the promotion or marketing of the transaction(s) or matter(s) addressed by this material. Pacific Life, its distributors, and respective representatives do not provide tax, accounting, or legal advice. Any taxpayer should seek advice based on the taxpayer's particular circumstances from an independent tax advisor.

Variable annuities are long-term investments designed for retirement. The value of the variable investment options will fluctuate and, when redeemed, may be worth more or less than the original cost. Withdrawals and other distributions of taxable amounts, including death benefit payouts, will be subject to ordinary income tax. If withdrawals and other distributions are taken prior to age 59½, a 10% federal tax penalty may apply. A withdrawal charge also may apply. Withdrawals will reduce the value of the death benefit and any optional benefits.

Pacific Life refers to Pacific Life Insurance Company and its affiliates, including Pacific Life & Annuity Company. Insurance products are issued by Pacific Life Insurance Company in all states except New York and in New York by Pacific Life & Annuity Company. Product availability and features may vary by state. Each company is solely responsible for the financial obligations accruing under the products it issues. Product and rider guarantees are backed by the financial strength and claims-paying ability of the issuing company and do not protect the value of the variable investment options.

Variable annuities are distributed by **Pacific Select Distributors, Inc.** (member FINRA), a subsidiary of Pacific Life Insurance Company, and are available through licensed third-party broker/dealers.

ABOUT SECURITIES AMERICA

Headquartered in Omaha, Nebraska, Securities America, Inc. has more than 1,900 financial professionals nationwide with more than \$53 billion in client assets under their supervision. Securities America Advisors, Inc. is an SEC-Registered Investment Advisory firm with more than \$13.9 billion in assets under management & administration that offers investment management, financial advice and financial planning through financial advisors. As “your business growth expert,” Securities America’s mission is to foster the success of financial professionals so they can provide quality, objective counsel and services to their clients. Additional information about Securities America is available online at www.securitiesamerica.com.

CONTACT INFORMATION

Securities America’s Wealth Management Department is here to help you find viable, effective answers to your needs – to your clients’ needs. From insurance to investing, from planning to execution, Securities America’s Wealth Management Department works continuously to find the most effective and competitive solutions. To the right is a list of some of the various members of the Wealth Management Department as well as their contact information and specialties.

Paul Lofties, CFP®, ChFC
Vice President, Acquisitions & Product
800-747-6111, Ext. 4500
plofties@saionline.com

Zach Parker, CFP®
Director, Annuities & Insurance
800-747-6111, Ext. 4514
zparker@saionline.com

Brent Stricklett
Associate Annuities and
Insurance Consultant
800-747-6111, ext. 3915
bstricklet@saionline.com

Available Benefits

Living Benefits

GMI	Optional
GMA	Optional
GMWB	Optional
Lifetime GMWB	Optional

Death Benefits

Return of Principal	Standard
Highest Anniversary	Optional
Fixed Percentage Increase	Not Available
Earnings Enhancement	Optional

Contract Information

Contract Type	B
Prospectus Date	5/1/2009
Supplement Date	12/15/2009
Date of Last Update By ASC	1/19/2010
Website	www.annuities.pacificlife.com
Phone Number	(800) 722-2333
Available in all states except NY, GU, PR & VI	

Surrender Schedule

Years of Surrender Charges	6
Surrender Schedule (%)	7,7,6,5,3,1
Surrender	Earnings plus 10% of remaining
Free Withdrawals	purchase payments. RMDs are penalty free.

Expenses & Fees

Mortality & Expense Risk	1.00%
Administration Charge	0.15%
Distribution Charge	0.00%
Total Annual Expense	1.15%
Annual Policy Fee	\$40
Annual Policy Fee Waived if Anniversary Value is Equal To Or Greater Than	\$50,000

Contract Operation - Where Does the Contract Pay?

Controlling Life: Annuitant

Owner	Joint Owner	Annuitant	Death of	Pays To
Husband	Wife	Husband	Husband	Joint Owner
Husband	Wife	Husband	Wife	Joint Owner*
Husband		Wife	Husband	Primary Beneficiary**
Husband		Wife	Wife	Owner***
Trust		Husband	Husband	Trust as Owner****

*At death of non-annuitant owner, only the account value is paid or continued.

**A contingent owner supercedes the primary beneficiary, if one was named.

At death of non-annuitant owner, only the account value is paid or continued.

***If a non-owner annuitant dies, and there is a joint or contingent annuitant, there will be no payout.

****The death benefit is equal to the surrender value (or the account value if reinvested in the contract by the trust).

Spousal Benefits & Continuation

	Yes	No
Can either spouse trigger the Guaranteed Death Benefit?	<input checked="" type="checkbox"/> *	<input type="checkbox"/>
If spousally continued is Death Benefit credited?	<input checked="" type="checkbox"/> **	<input type="checkbox"/>
If spousally continued is CDSC waived?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

* Only if both spouses are named as joint owners and joint annuitants.

** Only at the death of any owner who is also an annuitant or joint annuitant.

Sample Titling For Obtaining Spousal Benefits On A Non-Qualified Contract:

Owner	Joint Owner	Annuitant	Joint Annuitant	Primary Beneficiary	Contingent Beneficiary
Husband	Wife	Husband	Wife	Anybody	Anybody

To have an enhanced death benefit paid out at the death of either spouse, it is a requirement to have joint annuitants and joint owners named. If a joint annuitant is not named at time of application, one cannot be added later.

Issue Ages and Contribution Information

Non-Qualified	0-85	Owners & Annuitants	\$5,000 Initial	\$250 Additional
Qualified	0-85		\$2,000 Initial	\$50 Additional

Minimum initial investment not enforced on qualified contracts. Minimum additional investment amount is not enforced on any contract.

Subaccount Information

Number of Subaccounts	44	Free Transfers Per Year	25*
Subaccount Fee Range	0.28% to 1.64%	Transfer Fee	\$0

*Transfers in excess of 25 in a calendar year are not permitted.

However, one transfer of all or a part of the account to the money market is allowed until the beginning of the next year. Other limitations apply to American Funds and international subaccounts. Additionally, DCA, rebalancing or earnings sweeps programs do not count against the limit.

Subaccount fees include waivers and reimbursements.

Benefit Name	Benefit Type	Impact of Withdrawals
Guaranteed Income Advantage Plus	GMI	\$-for-\$ up to 5%; excess proportionate
Guaranteed Protection Advantage 3	GMA	Proportionate
Guaranteed Protection Advantage 5 (WA only)	GMA	Proportionate
Income Access	GMWB	Dollar-for-dollar up to 7%; excess proportionate
CoreProtect Advantage	Lifetime GMWB & GMWB	No impact up to 5%; excess proportionate

ANNUITY INTELLIGENCE REPORT™

By:  Advanced Sales
Corporation

Pacific Life Insurance Company
Pacific Voyages

Benefit Name	Benefit Type	Impact of Withdrawals
CoreIncome Advantage	Lifetime GMWB & GMWB	No impact up to limit; excess proportionate
Standard Death Benefit	Death Benefit	Proportionate
Stepped-Up Death Benefit	Death Benefit	Proportionate
Earnings Enhancement Guarantee (EEG)	Earnings Enhancement	Dollar-for-dollar
Foundation 10 Rider (closed)	Lifetime GMWB & GMWB	\$-for-\$ up to 5%; excess proportionate
Flexible Lifetime Income Plus (Single-closed)	Lifetime GMWB & GMWB	\$-for-\$ up to limit; excess proportionate
Flexible Lifetime Income (Single-closed)	Lifetime GMWB & GMWB	No impact up to 5%; excess proportionate
Flexible Lifetime Income Plus (Joint-closed)	Lifetime GMWB	\$-for-\$ up to limit; excess proportionate
Flexible Lifetime Income (Joint-closed)	Lifetime GMWB	No impact up to 5%; excess proportionate
Automatic Income Builder (GWB III-effct. 1/1/09)(closed)	Lifetime GMWB	\$-for-\$ up to limit; excess proportionate
Automatic Income Builder (GWB III-closed)	Lifetime GMWB	\$-for-\$ up to limit; excess proportionate

GMAB

Benefit Name	Guaranteed Protection Advantage 3
Benefit Type	GMAB
Whose life is benefit based on?	Owner(s) or last surviving annuitant
Description of benefit	<p>The benefit guarantees a return of adjusted purchase payments (contract value if added after issue) after a ten-year waiting period.</p> <p>Only purchase payments made in the first year of any 10-year term, whether the original term or a new term that restarts based on a step-up, are considered for this benefit.</p> <p>For Pacific Portfolios contracts (non-NY), funds allocated to the Guaranteed Interest Options are not included in the protected amount.</p>
Current benefit charge	0.95% assessed annually, calculated upon the benefit base
Maximum benefit charge	1.00%
Details of expenses	<p>Charge may increase if step-up is elected.</p> <p>For benefits issued prior to 10/1/09 the fee percentage is 0.75%, 0.55% if issued prior to 5/1/09, 0.45% if issued prior to 1/1/09, until a step-up occurs.</p>
Issue ages	Through age 85 (80 in NY) (all annuitants)
When can benefit be added?	Within 60 days of contract date or within 60 days after any contract anniversary
Step-up provisions	On the 3rd or subsequent anniversary the benefit base can be stepped-up to the current account value. Must be elected within 60 days of the anniversary date. Electing a step-up will restart the ten-year waiting period. Future step-ups are available three years after the last step-up.
Impact of withdrawals on benefit	Withdrawal reduces the benefit proportionately
Impact of RMDs on benefit	No special treatment for RMD withdrawals
Issues with older ages	The last step-up date must be at least 10 years prior to the maximum annuity commencement date
Investment restrictions	Adjusted contract value must be 100% invested among one of the following; a Portfolio Optimization model (A-D); among the asset allocation strategies, including Pacific Dynamix; within the guidelines of the Custom Model Program; or DCA Plus (if available) with monthly transfers into one of the above.
Spousal continuation	If an owner dies, the surviving spouse can elect to continue contract with benefit uninterrupted
Automatic termination of benefit	The benefit will automatically terminate when any portion of the contract value is no longer allocated according to the investment allocation requirements. Benefit terminates at the death of the first owner (unless spousally continued) or the death of the last surviving annuitant.
Manual termination of benefit	Can be terminated anytime, must wait one year to reinstate
Conflicting benefits & availability	Not available with any other accumulation rider.
	As of 7/14/2008, same state availability as contract except not available in WA. Check with carrier for current state availability.
Other information	On any contract anniversary, the GPA5 or GPA riders may be terminated to purchase the GPA3 rider

Lifetime GMWB & GMWB

Benefit Name	CoreProtect Advantage
Benefit Type	Lifetime GMWB & GMWB
Whose life is benefit based on?	Oldest owner (or younger annuitant if non-natural owner)
Description of benefit	<p>Guarantees 5% withdrawals of the benefit base per year for the life of the older owner, provided the first withdrawal or step-up took place at age 65 or older. If the older owner is younger than age 65 upon the first withdrawal or most recent step-up, withdrawals continue on a non-lifetime basis until the benefit base is depleted.</p> <p>On each contract anniversary prior to earlier of the first withdrawal or ten years after the benefit issue date, the benefit base is equal to the greater of:</p> <ul style="list-style-type: none"> - Highest anniversary value, adjusted for subsequent purchase payments; or, - Purchase payments (or account value at time of election if added after issue) increased annually at 5%, adjusted for subsequent purchase payments.
Current benefit charge	1.05% annually, assessed quarterly and calculated on the benefit base
Maximum benefit charge	1.50%
Details of expenses	Fee percentage may increase upon an automatic or manual reset. Automatic step-ups may be refused to keep the fee unchanged.
Issue ages	55-85 (owners and annuitants)
When can benefit be added?	Within 60 days of contract date or within 60 days after any contract anniversary
Step-up provisions	<p>After the earlier of the first withdrawal or ten years after the benefit issue date, automatic resets of the benefit base occur on each contract anniversary the account value is greater than the benefit base. Manual resets of the benefit base are also available within 60 after each anniversary, which resets the benefit base to the current account value (even if the account value is less than the benefit base).</p> <p>Fee may increase upon automatic or manual reset. Client may opt-out of an automatic reset within 60 days of the applicable anniversary to keep the fee unchanged.</p>
Impact of withdrawals on benefit	Withdrawals up to 5% have not impact on the guaranteed annual withdrawal amount and reduce the remaining benefit base dollar-for-dollar. Excess withdrawal amounts reduce the guaranteed annual withdrawal amount proportionately and the remaining benefit base by the greater of a dollar-for-dollar or proportionate reduction.
Impact of RMDs on benefit	RMDs are not considered excess withdrawals if conditions are met
Issues with older ages	-
Investment restrictions	Contract Value must be 100% invested among one of the following; a Portfolio Optimization model (A-D); among the asset allocation strategies, including Pacific Dynamix; within the guidelines of the Custom Model Program; or DCA Plus (if available) with monthly transfers into one of the above.
Spousal continuation	At the death of the first owner, the surviving spouse may continue to receive payments until the benefit base is reduced to zero. However, if a reset occurs (automatic or manual) on a contract anniversary on or after the spouse's 65th birthday, the surviving spouse will receive 5% withdrawals for life of the new benefit base.
Automatic termination of benefit	The benefit terminates if investments restrictions are not adhered to, upon a change of owner to a non-spouse or if the account value is reduced to zero through excess withdrawals. If entity owned, benefit terminates upon the death of any annuitant.
Manual termination of benefit	Cannot voluntarily terminate, under certain conditions may exchange for another living benefit

Lifetime GMWB & GMWB

Conflicting benefits & availability

Only one withdrawal benefit may be on a contract at anytime. Not available with Inherited IRAs or Inherited TSAs.

As of 2/16/2010, same state availability as contract.

Other information

Subsequent purchase payments after the later of first anniversary or most recent step-up may not exceed \$100,000 without prior approval.

For non-natural owners, benefit is based on the life of the younger annuitant.

Lifetime GMWB & GMWB

Benefit Name	CoreIncome Advantage
Benefit Type	Lifetime GMWB & GMWB
Whose life is benefit based on?	Oldest owner (or younger annuitant if non-natural owner)
Description of benefit	Guarantees 4% withdrawals of the benefit base per year for the life of the older owner, provided the first withdrawal or step-up took place at age 65 or older. If the older owner is younger than age 65 upon the first withdrawal or most recent step-up, withdrawals continue on a non-lifetime basis until the benefit base is depleted.
Current benefit charge	0.40% annually, assessed quarterly and calculated on the benefit base
Maximum benefit charge	1.00%
Details of expenses	Fee percentage may increase upon step-up or reset, which may be refused to keep fee unchanged
Issue ages	Through age 85 (all annuitants)
When can benefit be added?	Within 60 days of contract date or within 60 days after any contract anniversary
Step-up provisions	On each contract anniversary, if the current account value is greater than the benefit base an automatic step-up occurs. Client has a 60 day "opt-out provision" if they elect not to receive the most recent reset. Manual resets are also available within 60 days after a contract anniversary, which resets the benefit base to the current account value. Upon an automatic step-up or manual reset, the withdrawal amount is recalculated on the new benefit base.
Impact of withdrawals on benefit	Withdrawals up to the applicable percentage do not impact the guaranteed withdrawal amount and reduce the remaining benefit base dollar-for-dollar. Excess withdrawal amounts reduce the guaranteed withdrawal amount proportionately and the remaining benefit base by the greater of a dollar-for-dollar or proportionate reduction.
Impact of RMDs on benefit	RMDs are not considered excess withdrawals if conditions are met
Issues with older ages	-
Investment restrictions	Contract Value must be 100% invested among one of the following; a Portfolio Optimization model (A-D); among the asset allocation strategies, including Pacific Dynamix; within the guidelines of the Custom Model Program; or DCA Plus (if available) with monthly transfers into one of the above.
Spousal continuation	The lifetime component of the benefit cannot be continued as-is; however, the continuing spouse may continue to receive payments until the benefit base is reduced to zero. If a reset is elected, the benefit continues in full force based on the continuing spouse's age.
Automatic termination of benefit	The benefit terminates if investments restrictions are not adhered to, upon a change of owner to a non-spouse, if the account value is reduced to zero through excess withdrawals or if entity owned, upon the death of any annuitant.
Manual termination of benefit	Cannot voluntarily terminate, under certain conditions may exchange for another living benefit
Conflicting benefits & availability	Only one withdrawal benefit may be on a contract at anytime. Not available with Inherited IRAs or Inherited TSAs. As of 1/25/2010, same state availability as contract.

Lifetime GMWB & GMWB

Other information

Subsequent purchase payments after the later of first anniversary or most recent step-up may not exceed \$100,000 without prior approval.

For non-natural owners, benefit is based on the life of the younger annuitant.

Death Benefit

Benefit Name	Standard Death Benefit
Benefit Type	Return of Premium Death Benefit
Whose life is benefit based on?	Last surviving annuitant or owner who is also an annuitant
Description of benefit	Standard death benefit is the greater of: - Account value; or, - Adjusted Purchase payments.
Current benefit charge	0.00%
Maximum benefit charge	0.00%
Details of expenses	-
Issue ages	Through maximum contract issue age
When can benefit be added?	Default death benefit
Step-up provisions	N/A
Impact of withdrawals on benefit	Proportionate
Impact of RMDs on benefit	No special treatment for RMD withdrawals
Issues with older ages	-
Investment restrictions	None
Spousal continuation	The death benefit is credited and can be spousally continued if the deceased was an owner and annuitant. In addition, the spouse must be the sole recipient of the contract. If a non-annuitant owner died, the contract can be paid out or spousally continued at the account value only, not the death benefit value.
Automatic termination of benefit	Does not automatically terminate
Manual termination of benefit	Cannot voluntarily terminate
Conflicting benefits & availability	Cannot have in conjunction with other death benefits except the Earnings Enhancement Guarantee. Same state availability as contract.
Other information	-

Death Benefit

Benefit Name	Stepped-Up Death Benefit
Benefit Type	Highest Anniversary Value & Return of Premium Death Benefit
Whose life is benefit based on?	Last surviving annuitant or owner who is also an annuitant
Description of benefit	Death benefit is the greatest of: - Account value; - Adjusted purchase payments; or, - Highest anniversary value until the annuitant's 81st birthday, adjusted for subsequent payments and withdrawals.
Current benefit charge	0.20% annually, assessed daily upon the account value
Maximum benefit charge	0.20%
Details of expenses	-
Issue ages	Through age 75
When can benefit be added?	Time of application
Step-up provisions	Benefit automatically captures the highest anniversary value up to the anniversary prior to the oldest annuitant's 81st birthday
Impact of withdrawals on benefit	Proportionate
Impact of RMDs on benefit	No special treatment for RMD withdrawals
Issues with older ages	The last anniversary value considered for this benefit is the anniversary value before the oldest annuitant's 81st birthday
Investment restrictions	None
Spousal continuation	The death benefit is credited and can be spousally continued if the deceased was an owner and annuitant. In addition, the spouse must be the sole recipient of the contract. If a non-annuitant owner died, the contract could be paid out or spousally continued at the account value only, not the death benefit value.
Automatic termination of benefit	Benefit does not automatically terminate
Manual termination of benefit	Cannot voluntarily terminate.
Conflicting benefits & availability	Cannot have in conjunction with other death benefits except the Earnings Enhancement Guarantee. Same state availability as contract.
Other information	-

Earnings Enhancement

Benefit Name	Earnings Enhancement Guarantee (EEG)
Benefit Type	Earnings Enhancement Benefit
Whose life is benefit based on?	Last surviving annuitant or owner who is also an annuitant
Description of benefit	<p>Earnings enhancement death benefit is equal to a bonus of 40% of the earnings in the contract capped at 40% of adjusted purchase payments. The Bonus and cap are reduced to 25% for issue ages 70 to 75 on the effective date of the contract.</p> <p>If added within 60 days of the first anniversary, the cap is based on contract value on that anniversary.</p> <p>Purchase payments made within 12 months prior to death are not included in calculating the cap.</p>
Current benefit charge	0.25% assessed annually, calculated upon the account value
Maximum benefit charge	0.25%
Details of expenses	-
Issue ages	75 (based on oldest annuitant at time of election)
When can benefit be added?	Time of application, within 60 days of contract date, or within 60 days after first contract anniversary
Step-up provisions	None
Impact of withdrawals on benefit	Withdrawals are taken first from earnings then from net purchase payments on a dollar-for-dollar basis
Impact of RMDs on benefit	No special treatment for RMD withdrawals
Issues with older ages	Benefit enhancement and cap reduce to 25% for annuitants between the age 70-75 on the date the benefit is added.
Investment restrictions	None
Spousal continuation	The death benefit is credited and can be spousally continued if the deceased was an owner and annuitant. In addition, the spouse must be the sole recipient of the contract. Benefit continues for surviving spouse if age 75 or younger as of the date of death, otherwise the benefit and its fee will terminate. If a non-annuitant owner died, the contract could be paid out or spousally continued at the account value only, not the death benefit value.
Automatic termination of benefit	Benefit does not automatically terminate
Manual termination of benefit	Cannot voluntarily terminate
Conflicting benefits & availability	Same state availability as contract except not available in MN & WA
Other information	-

GLOSSARY - Benefit Pages

Benefit name	Brand name of benefit
Benefit type	This describes the type of benefit. Generally, the list of living benefits includes the income benefit (GMIB), accumulation benefit (GMAB), and two withdrawal benefits (GMWB_Lifetime GMWB). Generally, the types of death benefits include Return of Principal, Highest Anniversary Value, Percentage Increase, and the Earnings Enhancement Benefit.
Whose life is benefit based on?	Generally, identifies the party or parties to the contract on whom the benefit is based.
Description of benefit	Describes how the benefit works.
Current benefit charge	Shows the current rate charged for the benefit and defines what it is charged against, meaning (generally) the account value or benefit base.
Maximum benefit charge	This is the contractual limit that the benefit charge can increase to. The charge for most death benefits does not increase after the contract is issued. However, many living benefits have the potential to increase the amount charged based upon certain events.
Details of expenses	This section is for defining the particulars of how the benefit charges operate. If a benefit charge can change or increase, this section identifies what would trigger such a change or increase to take place.
Issue ages	Identifies the issue ages for the particular benefit.
When can benefit be added?	Answers when the benefit can be added to the contract. Typically, a benefit must be added at the time of application. Other times a contract allows the election of a benefit under certain conditions.
Step-up provisions	Describes how the benefit base increases. Items in this section include automatic reset, manual reset and bonuses to the benefit base before withdrawals begin.
Impact of withdrawals on benefit	Benefits, whether simple or complex, are typically reduced when a withdrawal takes place. This section identifies how a withdrawal impacts the benefit. Here are some examples: Account value is \$80,000. Death benefit is \$120,000. What happens to the benefit when a \$20,000 withdrawal is made? - Under the dollar-for-dollar method, the benefit would be reduced by \$20,000, resulting in a new death benefit value of \$100,000. - Under the proportionate method, the benefit would be reduced by the same percentage reduction in the account value. Therefore, \$20,000/\$80,000 is equal to a 25% reduction of the account value. The death benefit would then be reduced by that same percentage. So, 25% x \$120,000 is \$30,000, resulting in a new benefit of \$90,000.
Impact of RMDs on benefit	Indicates whether there is a special consideration for withdrawals that are Required Minimum Distributions. Some benefits may also impose restrictions that the RMD be taken through systematic withdrawals. RMDs for purposes of this section are RMDs only for the assets in that particular contract.
Issues with older ages	Some benefits terminate or stop increasing at certain ages. This section identifies those ages and describes how the benefit changes.
Investment restrictions	Identifies if there are any restrictions put in place by the insurance company when a particular benefit is elected.
Spousal continuation	This section defines what happens to the benefit if the contract is spousally continued under the Internal Revenue Code rules. Typically, to have true spousal continuation, upon the death of any owner, a spousal recipient may continue the contract tax deferred.
Automatic termination of benefit	Events or situations that cause the benefit to terminate are covered in this section. For example, some benefits terminate if any of the owners is changed, or if an owner attains a certain age. What is not covered here are the basic events that will cause the termination of a benefit, such as taking a full withdrawal of the contract; annuitizing the contract; making a 1035 exchange; or transferring to/from an IRA.
Manual termination of benefit	Some benefits allow the owner to terminate the benefit at certain times. This section is where those conditions are described.
Conflicting benefits & availability	Some benefits cannot be elected in conjunction with other benefits. This section describes any conflicts with the other benefits offered on the contract.
Other information	This is the "catch all" section for information that does not fit into any of the other sections. Often this section includes administrative restrictions, titling peculiarities, information on whether the benefit is available with certain types of contracts, or whether purchase payments after a certain time period are not considered for the benefit.

GLOSSARY - Summary Page**Available Benefits**

Provides a quick look at the features available with the contract and notes whether they are standard or optional.

Living Benefit Key:

GMIB - Guaranteed Minimum Income Benefit

GMAB - Guaranteed Minimum Accumulation Benefit

GMWB - Guaranteed Minimum Withdrawal Benefit

Lifetime GMWB - Lifetime Guaranteed Minimum Withdrawal Benefit

Contract Information

The first item in this section explains the share type, which refers to the sales fee structure.

Share Type Key:

A share - contains an upfront sales charge.

B share - deferred sales load with surrenders lasting at least 5 years.

C share - no upfront and no back end (deferred) sales load.

L share - deferred sales load lasting at least 1 year but not more than 4 years.

Bonus - deferred sales charge with a credit that is added for premium payments.

The date of prospectus, any supplements and date of last review by Advanced Sales Corporation are also listed in this section. Website and phone numbers are also provided.

Surrender Schedule

This section defines the years of surrender charges that are assessed. For example, if the report has "7,6,5,4,3,2,1" in this field, it means - 7% penalty in the 1st year, 6% penalty in the 2nd year, and so on.

Liquidity Features defines how much can be taken out each year without having a surrender penalty. Typically the free withdrawal amount is non-cumulative, which means any unused withdrawal amount in one year cannot be used in later years.

Expenses & Fees

Simply defines the fees associated with owning the contract.

Contract Operation - Where Does the Contract Pay?

"Controlling life" defines whose life controls the contract for payout purposes. Generally, all contracts (owner driven and annuitant driven) will pay out at the death of the first owner.

The titling matrix spells out to whom the contract will pay under different scenarios. This section does not describe what will pay out; the benefits pages will describe what amount will be paid out in more detail.

Spousal Benefits & Continuation

Answers whether the death of either spouse can trigger a guaranteed death benefit. It also answers whether the minimum guaranteed death benefit is credited if a spouse continues the contract. This section also indicates whether a surrender charge (CDSC) is waived if a spouse continues the contract.

The Sample Titling section provides an example of one way to title the contract to provide the most benefits for both spouses. This does not ensure that benefits will be the same for both on all contracts.

Issue Ages and Contribution Information

Spells out the issue ages of the contract and defines on whose age the contract is based, as well as the minimum contributions amounts.

Sub Account Information

Details the number of sub-accounts available for new money, as well as the fee range of the sub-accounts. Generally shows the fees net of any waivers and/or expense reimbursements. Also listed are transfer limitations and fees charged for excessive transfers.